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July 26, 2021

VIA ECF

Honorable James M. Wicks
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *AA Medical P.C. v Khaled Almansoori, M.D.*
Docket No. : 20-CV-03852 (DG)(JMW)
File No. : 200139

Dear Judge Wicks:

We represent Defendant Khaled Almansoori, M.D. ("Dr. Almansoori"). We write regarding the July 28, 2021 deadline to submit a proposed case management schedule. We respectfully request an extension of the deadline to submit a proposed case management schedule until seven (7) days after the Court's ruling on Dr. Almansoori's forthcoming motion to dismiss the consolidated amended complaint in this action.

On July 14, 2021, Dr. Almansoori filed a pre-motion letter in anticipation of moving to dismiss the consolidated amended complaint. (See Docket Entry No. 29.) On July 21, 2021, Plaintiff AA Medical, P.C. ("AA Medical") submitted its opposition to the pre-motion letter. (See Docket Entry No. 30.)

As set forth in the referenced correspondence to Judge Gujarati and the prior filings, in response to filing his own lawsuit to recover wages owed by AA Medical, Dr. Almansoori has been subjected to an onslaught of lawsuits by AA Medical, including the three separate lawsuits in the Eastern District that were recently consolidated into this action. In a transparent effort to force Dr. Almansoori to expend substantial resources in court, AA Medical filed separate actions in Suffolk County, Nassau County, the Eastern District, and the Southern District. Motion practice followed in each action, including Dr. Almansoori's pre-motion letters in each of the three Eastern District lawsuits indicating Dr. Almansoori's intent to seek dismissal. We are now left with this consolidated Eastern District action as well as a consolidated Suffolk County action. We respectfully request that the Court permit a decision on the anticipated motion to dismiss before the parties submit a proposed case management plan or proceed with any discovery. AA Medical's

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counsel advised on Friday July 23, 2021 that AA Medical does not consent to this application for a stay of submission of a proposed case management plan.

If the Court denies our request, we ask on behalf of all parties that the deadline for the submission of the proposed case management plan be extended to August 10, 2021, which is one week before the next Court conference.

This is the first request for an extension of the deadline. Thank you for your consideration of this matter.

Respectfully submitted,

SOKOLOFF STERN LLP

A handwritten signature in black ink, appearing to read 'AK', is written over the printed name of Adam I. Kleinberg.

ADAM I. KLEINBERG

cc: All counsel of record (via ECF)